



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

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Dear Interested Parties:

Re: Leaking UST Remediation Program
Guide (RPG) Potential Petroleum
Contaminants (PPC) Table 3.1
Clarifications

Clarification Regarding the Remediation Program Guide Potential Petroleum Contaminants, Section 3, Table 3.1

Naphthalenes Analytical Method Issue for soil and ground water for gasoline releases:

Section 3 (Table 3.1) of the Remediation Program Guide (RPG) includes Naphthalenes (naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene) as Potential Petroleum Contaminants (PPCs) when gasoline range products are being investigated during initial site characterization. If a gasoline range product release is suspected or confirmed and sampling is required, IDEM recommends Naphthalenes be analyzed and reported along with other volatile organic compounds (VOCs) via U.S. EPA Method 8260. These procedures should be followed during site characterization, unless otherwise directed by IDEM. Once site characterization is completed, specific contaminant reporting should be identified in the Corrective Action Plan based on site-specific remediation objectives.

VOC reporting for Gasoline Range Product, Diesel Range Product, Waste Oil and Unknown Petroleum releases:

The laboratory should report all VOCs (to the extent practicable) consistent with current practices, including 1 and 2-methylnaphthalene.

PPCs reported by the laboratory above the RCG Screening Level:

In some cases, the RCG screening levels may be lower than the laboratory reporting limits. If lower reporting limits are necessary, IDEM may request the use of “non-routine” EPA Methods. In addition, Section 3 (Table 3.1) of the Remediation Program Guide states that lead scavengers should be reported during site characterization utilizing U.S. EPA Method 8260. IDEM consistently sees ethylene dibromide (EDB) being reported at or below the RCG Ground Water Screening Level of 0.05 µg/l. It is not necessary to sample and analyze for EDB utilizing U.S. EPA Method 8011 unless otherwise directed by IDEM.